

## EXHIBIT D

1

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE

Civil Action No. 18-cv-00327 DBH

\* \* \* \* \*

DAVID and AMY CARSON, et al.,

Plaintiffs

vs

ROBERT G. HASSON, JR., in his official  
Capacity as Commissioner of the Maine  
Department of Education,

Defendant

\* \* \* \* \*

DEPONENT: **MARTHA BOONE**

Taken before Joanne P. Alley, a Notary Public in and for  
the State of Maine, at the offices of the Maine Attorney  
General, Cross State Office Building, Sixth Floor,  
Sewall Street, Augusta, Maine, on December 17, 2018,  
beginning at 2:15 p.m., pursuant to notice given.

I N D E X

DEPONENT:

MARTHA BOONE

By Attorney Forster 4

By Attorney Keller None

E X H I B I T S

Page

No Exhibits Marked or Offered

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(Deposition taken before Joanne P. Alley,  
Notary Public, at the offices of Maine Attorney General,  
Cross State Office Building, Sixth Floor, Sewall Street,  
Augusta, Maine, on December 17, 2018, beginning at 2:15  
p.m.)

(The deponent was administered the oath by  
the Notary Public.)  
MARTHA BOONE, after having been duly sworn by  
the Notary Public, was deposed and testified as follows:

E X A M I N A T I O N

BY MS. FORSTER:

Q. Good afternoon.

A. Hi.

Q. So just to confirm, going back to the very first  
exhibit, you are here to respond to four, five and  
six?

A. Yes.

Q. All right. What is your educational background?

A. My bachelor's degree is in elementary education,  
specifically more middle school, fourth through  
eighth grade, and then my master's degree is in  
leadership and supervision.

Q. And where did you get those degrees?

A. Both at Liberty University in Lynchburg, Virginia.

Q. And what is your work history?

1 A. My work history, my husband and I were missionaries  
 2 for 20 years and so my first four years of teaching  
 3 I taught at a school for missionary kids in  
 4 Swaziland, Africa in a composite seventh and eighth  
 5 grade classroom; and then when my children were  
 6 born, I started doing remedial reading and math  
 7 instruction both for missionary kids and then for  
 8 local children in the area and then we moved to the  
 9 Island of Guam, and we were there for four and a  
 10 half years and I did the remedial reading and math  
 11 instruction for K through 8 kids at that school for  
 12 four and a half years and then we moved to  
 13 Melbourne, Australia, for four years and then I  
 14 worked in the special ed department there at a K  
 15 through 12 school, primarily focused in grades 5  
 16 through 10, working in reading and math  
 17 remediation. So then in 2003, we moved to Maine  
 18 and I taught at Bangor Christian, I did -- I was  
 19 science my first semester. I was a long-term sub  
 20 for a teacher that had to leave for the first  
 21 semester and then I taught high school language  
 22 arts until I moved into administration in the fall  
 23 of 2008.  
 24 Q. So you've been in administration for ten years now?  
 25 A. I have, yes.

1 Q. Are you in the classroom at all now?  
 2 A. I teach seventh grade math.  
 3 Q. Can't get away, right?  
 4 A. Can't get away.  
 5 Q. Do you have a role with respect to Crosspoint  
 6 Church?  
 7 A. I volunteer. My husband is the youth pastor there  
 8 and so I volunteer, I teach high school Sunday  
 9 School and I help out with the youth but no  
 10 official role, just as a volunteer.  
 11 Q. You're a member of the church?  
 12 A. Yes.  
 13 Q. And the youth pastor is another one of the people  
 14 who report to the --  
 15 A. Senior pastor.  
 16 Q. -- senior pastor?  
 17 A. Yes, that's right.  
 18 Q. I keep getting that pastor in chief stuck in my  
 19 head. We already marked the student handbook.  
 20 A. Yes.  
 21 Q. If you look at page 15, our numbers, so the little  
 22 numbers on the bottom, Statement of Faith?  
 23 A. Um-hum.  
 24 Q. Is this a true and accurate Statement of Faith that  
 25 governs the school?

1 A. Yes.  
 2 Q. And if you look at page 16 --  
 3 A. Um-hum.  
 4 Q. -- that first paragraph, the first sentence,  
 5 "certain Biblical issues that are not necessarily  
 6 doctrinal in nature have become the focus of  
 7 litigation against Christians, churches and  
 8 Christian schools."  
 9 A. Um-hum.  
 10 Q. Could you give me an example of what those are?  
 11 A. Basically the things that are delineated below  
 12 that.  
 13 Q. Oh, okay, so questions about protection of  
 14 children, marriage and sexuality, a statement about  
 15 love, these are issues that you believe have become  
 16 the source of litigation?  
 17 A. Among others, yeah, but those would be primarily,  
 18 yup.  
 19 Q. On the next page --  
 20 A. Um-hum.  
 21 Q. -- which is page 17 --  
 22 A. Yup.  
 23 Q. -- if you look at family relationships, where it  
 24 says "the husband is to be the leader of the home,"  
 25 is that something that you teach as part of the

1 school curriculum or is that just an underlying  
 2 assumption?  
 3 A. That would be taught in some of the Bible classes,  
 4 yeah, because the scriptures that we have, one of  
 5 the high school Bible classes covers Galatians,  
 6 Ephesians, Philippians and Colossians and so those  
 7 two verses that are referenced there would  
 8 naturally be covered when they are studying through  
 9 those books in their Bible class. So it would be  
 10 something that is discussed, yes, as part of their  
 11 Bible curriculum.  
 12 Q. And the same for the next paragraph about the role  
 13 of the wife --  
 14 MS. RIVERA: I'm going to object here  
 15 because I think the specific beliefs are beyond the  
 16 scope of the examination.  
 17 BY MS. FORSTER:  
 18 Q. The question is, is it taught in the school?  
 19 A. Yes.  
 20 MS. RIVERA: Is what taught?  
 21 BY MS. FORSTER:  
 22 Q. These beliefs, are they actively taught as part of  
 23 the school curriculum?  
 24 A. Um-hum.  
 25 MR. TAUB: You have to say yes or no.

1 THE DEPONENT: Yes, yes.  
 2 BY MS. FORSTER:  
 3 Q. On the next page, page 18, Objectives in Education,  
 4 is this a true and accurate statement of the  
 5 objectives?  
 6 A. Yes.  
 7 Q. Is it fair to say that one of the objectives of  
 8 Bangor Christian Schools is to teach students to be  
 9 good Christians?  
 10 A. Yes.  
 11 Q. To teach students to promote Christian values?  
 12 A. Yes.  
 13 Q. To develop Christian leadership?  
 14 A. Yes.  
 15 Q. On page 26 I believe it is, yes, you explain the  
 16 grading scales and then down at the bottom of the  
 17 page you talk about academic probation.  
 18 A. Um-hum.  
 19 Q. One way you can get academic probation is an  
 20 overall grade average below 75 and then another way  
 21 is a grade below 75 in Bible.  
 22 A. Um-hum.  
 23 Q. Why is Bible singled out as a subject?  
 24 A. Because that is the primary thing in our school.  
 25 We are a Christian school and we always tell

1 families that that's not just a name, that is what  
 2 we do, and as you asked, what are our objectives,  
 3 all of those things that you listed, our biggest  
 4 emphasis is that. We want to make sure that they  
 5 are taking that class seriously. It could be one  
 6 that they could think, well, it doesn't matter when  
 7 I go to college, if I go to the University of  
 8 Maine, they don't care what I get on Bible, they  
 9 might care what I get on English, and we are  
 10 emphasizing that that is the utmost importance to  
 11 us. We want you to do well in your other content  
 12 areas and this is of the utmost importance to us.  
 13 Q. And I believe that that's also a condition for  
 14 being able to play sports, right?  
 15 A. Yes.  
 16 Q. Or to hold office in a student organization?  
 17 A. Yes.  
 18 Q. Or an honor academically?  
 19 A. Um-hum, that's correct.  
 20 MS. RIVERA: Let her finish her questions  
 21 before you answer.  
 22 THE DEPONENT: I'm sorry.  
 23 BY MS. FORSTER:  
 24 Q. On page 27, the next page, under High School  
 25 Graduation, the first sentence, "to graduate from

1 Bangor Christian Schools a student must demonstrate  
 2 the ability to function in a manner that is in the  
 3 agreement with the philosophy of BCS." What does  
 4 that mean?  
 5 A. So they could be -- it's basically -- it's weird to  
 6 be there I guess in the academic requirements but  
 7 they could be asked to leave the school if they're  
 8 not behaving and functioning in a manner that's in  
 9 agreement with the philosophy of BCS, and so that's  
 10 what that means. It's odd, you're right, that that  
 11 sentence is there attached to the academic stuff  
 12 that's going on in course requirements.  
 13 Q. So in reality, are the graduation requirements the  
 14 credit requirements listed below?  
 15 A. Um-hum.  
 16 Q. And this statement is more of an issue of whether  
 17 or not you maintain presence in the school?  
 18 A. Right.  
 19 Q. So a student having attained these credit  
 20 requirements will receive a diploma from BCS?  
 21 A. If they have -- yes, if they survive to June  
 22 whatever it is of that year of graduation, yes,  
 23 then they will.  
 24 Q. So physical presence plus credits earned?  
 25 A. Yes.

1 Q. Excellent. On page 30, and this is part of your  
 2 conduct and discipline section.  
 3 A. Um-hum.  
 4 Q. It says, "BCS follows the Biblical values of  
 5 Matthew 18?"  
 6 A. Um-hum.  
 7 Q. Could you describe what the Biblical values of  
 8 Matthew 18 say about discipline?  
 9 A. Well, it's dealing with the idea of if you have a  
 10 problem with someone, that you go to that person  
 11 and you talk to that person about it, and so when a  
 12 teacher recognizes or I, as the principal,  
 13 recognize that a student is having difficulties, I  
 14 need to go to that person and talk to them about it  
 15 and we deal with it in that way, don't just kick  
 16 somebody out without talking to them about it or  
 17 trying to help them with it and work through it.  
 18 If you notice in our discipline levels, one of the  
 19 consequences at each level is a conversation with  
 20 the teacher. That's a big part of that Matthew 18  
 21 thing, making sure that our discipline is not  
 22 punitive, the got-you sort of situation but a  
 23 learning -- we want you to learn from whatever it  
 24 is. We want to help you not make that choice again  
 25 or make that mistake again and so that Matthew 18

1 is that as believers, we're to go to each other.  
 2 If I know you've offended me, I should go to you;  
 3 if you know that you've offended me, you should  
 4 come to me and so it's that perspective.  
 5 Q. And does that always give the student the  
 6 opportunity to tell their side --  
 7 A. Um-hum.  
 8 Q. -- before you make a decision about discipline?  
 9 A. Um-hum, yes.  
 10 Q. Does that run even to when you're thinking of  
 11 something more significant like a suspension or an  
 12 expulsion?  
 13 A. Yes, it does.  
 14 Q. So students have the right to tell their side?  
 15 A. Yes.  
 16 Q. And who makes the final decision on something as  
 17 significant as a suspension or expulsion?  
 18 A. Generally speaking, a suspension would be my  
 19 decision but that is something that the  
 20 administrative team, including our school  
 21 counselor, plays a role in. I have never made a  
 22 decision by myself without having a discussion with  
 23 the school counselor and with whoever was the  
 24 headmaster at that time. Before an expulsion  
 25 happened, that always goes all the way to the top

1 and we talk about is there any way we can save this  
 2 child, we prefer not to remove a kid from the  
 3 school, you know, what can we do to work with the  
 4 child and with the family and all of that, but that  
 5 one always goes all the way through because that's  
 6 such a significant impact on the long-term on the  
 7 child.  
 8 Q. And who is the top? Is it the headmaster?  
 9 A. Yes, yes.  
 10 Q. Do you report directly to the headmaster?  
 11 A. I do.  
 12 Q. And who reports directly to you?  
 13 A. The teachers report to me, yup.  
 14 Q. The whole K/12?  
 15 A. Yes.  
 16 Q. And any sort of para-educators that are in the  
 17 school, do they also report to you?  
 18 A. The school counselor reports to me and then really  
 19 the only other para-educators are our classroom  
 20 aides and they would.  
 21 Q. And when you say the school counselor, do you mean  
 22 a guidance counselor?  
 23 A. Her degree and license is as a school counselor.  
 24 Q. Okay. I just didn't know whether you meant a  
 25 counselor like through the church or --

1 A. No.  
 2 Q. An academic version?  
 3 A. Right.  
 4 Q. Okay. Thank you for presenting so many documents  
 5 about your curriculum. I feel like I've learned  
 6 more about how a curriculum works than I ever knew  
 7 before by reading them all. I wondered though, is  
 8 there sort of a base that you use to build your  
 9 curriculum? How do those documents all start?  
 10 A. We began the process ten years ago as part of our  
 11 reaccreditation with NEASC in 2009, and so where  
 12 they began was with each committee that was  
 13 dedicated to a different content area, reviewing  
 14 national standards, at the time the Maine State  
 15 Learning Standards, to see what are the things that  
 16 students should be learning at each grade level,  
 17 what are the skills, content, you know, all of  
 18 those things that they should be learning at each  
 19 content level and each content level at each grade  
 20 level. So we developed those curricular maps based  
 21 on that looking at our -- the textbooks and things  
 22 that we chose and felt fit our philosophy the best,  
 23 aligning those then with the standards that are  
 24 appropriate for students to learn and then that's  
 25 how we've continued as we go through a rotation

1 each year of reviewing different curricular maps.  
 2 We refer back again to the national and state  
 3 standards, look to them to align with them and go  
 4 that way.  
 5 Q. I noticed, particularly in your science curriculum,  
 6 that you have a column on the far left that talks  
 7 about the Biblical foundation. I may not have  
 8 those words exactly right.  
 9 A. Yes, um-hum.  
 10 Q. And then the next column talks about the course  
 11 objectives.  
 12 A. Yes.  
 13 Q. How do you decide what pieces of Biblical  
 14 foundation get used in each of your classes? Is  
 15 that something you do after you have the template  
 16 you described or do you start with the Biblical  
 17 foundations?  
 18 A. It might have gone the second way starting with the  
 19 Biblical and going to the content; however, we  
 20 built the curricular maps the first time through in  
 21 2009 without specifically putting those pieces in,  
 22 and so as we have reviewed the curriculum, we  
 23 recognize that -- the word that we're using is that  
 24 we have to be intentional and thinking about how  
 25 are we going to make sure that everything we say

1 we're doing in our philosophy statements is  
 2 actually being accomplished and isn't just  
 3 something that sounds nice written on a piece of  
 4 paper. So that's something we have backwards --  
 5 worked backwards and said these are the different  
 6 things and this is where they will be placed in and  
 7 how we'll introduce them and marry them with the  
 8 standards that they're learning in science or  
 9 English or math and so forth going forward. So  
 10 that's why it should have probably been the other  
 11 way but that is how it ended up happening.  
 12 Q. What happens when there's a conflict?  
 13 A. Explain what you mean.  
 14 Q. So again thinking about the science standards, are  
 15 there sometimes when your Biblical reference  
 16 conflicts with what an academic standard might be?  
 17 A. No.  
 18 Q. Okay. So when you talk about cell mutation, for  
 19 example, yet at the same time on your left-hand  
 20 side you're talking about creationism or  
 21 intelligent design as opposed to basic cell  
 22 mutation, how do you make those work together?  
 23 A. They actually work together perfectly because there  
 24 is no place where science contradicts scripture or  
 25 scripture contradicts science, and so what we're

1 able to do is use scientific fact and research and  
 2 show how there isn't a conflict between those  
 3 things, and so there isn't an issue and I guess  
 4 that's how I would answer the question. There  
 5 isn't ever a conflict between -- one does not  
 6 contradict the other.  
 7 Q. And is that consistent throughout the curriculum?  
 8 I mean, I picked science only because it's been the  
 9 most highly-publicized area where people have had  
 10 questions. When you teach English language arts,  
 11 for example, do you use some Christian texts and  
 12 some regular or ordinary text?  
 13 A. Yes, we do; yes, we do. I guess you could give me  
 14 some examples of exactly what you mean by that.  
 15 Q. Well, this morning we talked about with respect to  
 16 Temple Academy that there was a concern about what  
 17 was appropriate reading material for children and  
 18 they pointed out that they taught Macbeth even  
 19 though they're the witches of Macbeth. So when you  
 20 choose texts for your courses, are you looking for  
 21 good, Christian-appropriate stories even when they  
 22 might be also traditional academic favorites that  
 23 you read in high school?  
 24 A. So I believe you're asking me -- and you can tell  
 25 me if this is correct -- do we use any texts that

1 would be also used in, say, a nonsectarian school?  
 2 Q. Right.  
 3 A. Yes, we do.  
 4 Q. And you have some texts that are specifically or  
 5 deliberately Christian in focus, is that correct?  
 6 A. Do you mean -- are we still talking about language  
 7 arts or just in the broad curriculum?  
 8 Q. Well, I was thinking about language arts and  
 9 particularly in the younger grades those are books  
 10 that are, I'm using specifically Christian, but  
 11 they're designed and I noticed in the bibliography  
 12 are Christian publishing houses. Do you ever  
 13 consider and reject books to be used as part of  
 14 your English language arts curriculum because you  
 15 think they're inappropriate in a Christian  
 16 environment?  
 17 A. Um-hum, yes, we do.  
 18 Q. Could you give me an example?  
 19 A. Of a book we have considered and rejected?  
 20 MS. RIVERA: Is that what you're asking?  
 21 MS. FORSTER: Yes.  
 22 BY MS. FORSTER:  
 23 A. I can't think of one because our curriculum has  
 24 been pretty consistent for several years. What we  
 25 read in our various English classes has been fairly

1 consistent. I mean, there have been -- when I was  
 2 teaching language arts, there were books that I  
 3 reviewed and didn't choose not just because of a  
 4 Christian content but I felt were not age  
 5 appropriate, you know, in general.  
 6 Q. Right.  
 7 A. But I can't -- no, I can't give you an example of  
 8 something we rejected.  
 9 Q. I was hoping you would say Moby Dick. Everyone  
 10 wants to get out of reading Moby Dick, I mean, but  
 11 apparently the whale is just fine, huh?  
 12 A. Yeah.  
 13 Q. Is there any way in topics other than Bible to  
 14 separate the religious instruction from the  
 15 academic instruction or is it completely  
 16 intertwined?  
 17 A. It's completely intertwined.  
 18 Q. Okay, and there would be no way to have a student  
 19 be successful in the school if they were resistant  
 20 to the sectarian instruction?  
 21 A. That's correct.  
 22 Q. When you make decisions about grading, are those  
 23 decisions based on traditional academic indicia,  
 24 performance on tests, class participation, et  
 25 cetera, alone or is there also an element of

1 faithfulness of belief, of performance with respect  
 2 to the overarching values that goes into that  
 3 calculation?  
 4 A. Not into our academic calculations, no. It's  
 5 academic performance, yup.  
 6 Q. Outside of -- well, are there any chapel services  
 7 that occur during the school day?  
 8 A. Yes, once -- once a week.  
 9 Q. And are they led by pastors, by students?  
 10 A. Yes.  
 11 Q. Oh, all of the above?  
 12 A. Yes.  
 13 Q. Is part of what students learn to do either in  
 14 Bible class or in one of the other classes present  
 15 at chapel?  
 16 A. I'm not sure what you mean.  
 17 Q. Do you help them or do they learn how to be  
 18 effective communicators at chapel or, you know,  
 19 speaking about their faith at chapel, is that one  
 20 of the things that they're taught?  
 21 A. Not specifically at chapel. You know, part of the  
 22 language arts curriculum is communication and one  
 23 of our goals for learning to be good communicators  
 24 is to communicate their beliefs and their faith and  
 25 so that would be hopefully a carryover to if I can

1 communicate through speaking in my class, then if I  
 2 have the opportunity to also speak at chapel, that  
 3 carries over, but that's not one of the goals. To  
 4 train them to speak in chapel would not be one of  
 5 the goals.  
 6 Q. I notice that you have a very specific homework  
 7 policy about Wednesday nights.  
 8 A. Um-hum.  
 9 Q. What happens on Wednesday night?  
 10 A. Many churches have a midweek service on Wednesday  
 11 nights, and we want to leave the opportunity for  
 12 kids who want to go to their youth group to go to  
 13 their church service on Wednesday nights and not  
 14 have to feel, oh, I've got a boatload of homework  
 15 to do. They've got that option to go.  
 16 Q. From how many churches would you say your student  
 17 population comes?  
 18 A. Over 40, and we have a group of churches that most  
 19 of them come from, 75 percent or so come from.  
 20 Q. Okay.  
 21 A. Five to seven churches, and then that other 25  
 22 percent is one kid from this church and one kid  
 23 from that church over the -- all over the area.  
 24 Q. Wow. When I was looking on page 33 --  
 25 A. Your 33, right?

1 Q. Yes, BDS 33, "the following offenses," and this is  
 2 the last paragraph, "may lead to immediate  
 3 suspension and probable expulsion," the last bullet  
 4 point, "presenting oneself as a gender other than  
 5 the one included on his or her birth certificate."  
 6 A. Um-hum.  
 7 Q. Is that essentially nonnegotiable?  
 8 A. We would work with any kid, just like we would with  
 9 all of these things. That's why it isn't an  
 10 immediate -- it may lead to but doesn't always lead  
 11 to, so there would be conversations that would go  
 12 on with the student and their parent and working  
 13 with them just like we would with any other area,  
 14 but if even through working with them there was no  
 15 movement on the part of the student, that that was  
 16 how they were going to present oneself, would that  
 17 mean they could no longer attend school? Just like  
 18 all the other areas, if there were no movement, if  
 19 the child wanted to continue drinking every weekend  
 20 or whatever, you know, any of those other issues,  
 21 yes.  
 22 Q. Um-hum. What if a student didn't present him or  
 23 herself as a gender other than the one included on  
 24 the birth certificate but was openly gay and, you  
 25 know, communicated that regularly in the school

1 environment and to his or her classmates?  
 2 A. So if you refer back to where in the beginning  
 3 where we talk about our Statement of Faith and how  
 4 we look at those things, that would fall under an  
 5 immoral activity by that definition. So yes, it --  
 6 that would fall just like again if I was  
 7 heterosexual and sleeping with my boyfriend and  
 8 saying I'm going to continue doing this, I don't --  
 9 I'm not -- you know, that would be the same  
 10 situation.  
 11 Q. And so there would be counseling but ultimately if  
 12 there was no change in the student's position, that  
 13 would be done?  
 14 A. Um-hum, yes.  
 15 Q. All right. I'm going to take a break, consult with  
 16 my cocounsel here and, you know, you can argue on  
 17 the way home about who had it worse.  
 18 (OFF RECORD FROM 2:40 TO 2:42)  
 19 BY MS. FORSTER:  
 20 Q. A couple of very quick follow-ups. Right before we  
 21 broke when we were talking about behavior that  
 22 would lead to expulsion, you said when I asked you  
 23 about a student who was a professed homosexual, you  
 24 said it was similar or just like if another student  
 25 was having sex on the weekend and didn't want to



1 cease that activity. I just want to be clear, if  
 2 the student who professed that they were homosexual  
 3 was celibate, this wasn't about actually having  
 4 sex, would that still be a problem?  
 5 A. There would be discussions with him or her to see  
 6 what's going on in their life and their world and  
 7 their thinking, so it wouldn't be automatic but if  
 8 they are entrenched in this is who I am, I think  
 9 that it is right and good, it clearly goes against  
 10 our Biblical beliefs so, yes, it would be that as  
 11 well.  
 12 Q. Okay. I just couldn't tell whether you were  
 13 focused on the conduct or --  
 14 A. Correct, I gotcha.  
 15 Q. Chapel is mandatory, isn't it?  
 16 A. Yes.  
 17 Q. And is one of the things -- I think you said one of  
 18 the things that you were teaching them was about  
 19 the ability to spread Christianity in the world.  
 20 Is that part of what they're learning not  
 21 necessarily through chapel but through all of their  
 22 education?  
 23 A. Yes.  
 24 MS. FORSTER: Okay, I think that's it.  
 25 MR. KELLER: I have nothing.

1 MS. RIVERA: We will read.  
 2 (Whereupon, the above-named deposition was  
 3 concluded at 2:43 p.m.)  
 4 (The deponent does not waive reading and  
 5 signing.)  
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1 CERTIFICATE  
 2 I, Joanne P. Alley, a Notary Public in and for  
 3 the State of Maine, hereby certify that on the 17th day  
 4 of December, 2018, personally appeared before me the  
 5 within-named deponent who was sworn to testify to the  
 6 truth, the whole truth, and nothing but the truth in the  
 7 aforementioned cause of action and that the foregoing is  
 8 a true and accurate record as taken by me by means of  
 9 computer-aided machine shorthand.  
 10  
 11 I further certify that I am a disinterested  
 12 person in the event or outcome of the aforementioned  
 13 cause of action.  
 14  
 15 IN WITNESS WHEREOF, I have hereunto set my hand  
 16 this 11th day of January, 2018.  
 17  
 18 \_\_\_\_\_  
 19 Joanne P. Alley  
 20 Court Reporter/Notary Public  
 21  
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 6  
 7 Ms. Martha Boone  
 8 c/o Kimberly Y. Smith Rivera, Esq.  
 9 11803 104th Street.  
 10 Largo, FL 33773  
 11  
 12 RE: Carson, et al. v Robert G. Hasson  
 13  
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19 TITLE: Carson, et al. v Robert Hasson

20 DEPOSITION OF: Martha Boone

21 DATE OF DEPOSITION: December 17, 2018

22 NOTICING PARTY: Sarah Forster, Esq.

23 REPORTER: Joanne P. Alley

24

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